


FILED

United States District Court
Eastern District of California

JAN 03 2025

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY  DEPUTY CLERK

Christopher Nathaniel

Washington

Case # 2:20-cv-2261

Plaintiff

Plaintiff's Notice of Motion Requesting

vs

leave to submit a motion for judgment

Ralph Diaz

& Trial by Consent pursuant to FRCP

Defendant's Rule # 56, FRCP Rule # 73, and LR # 291, and
LR # 301

Comes now

Above stated plaintiff Christopher Nathaniel Washington in this
matter which was originally submitted into this court on or about
November-12-2020 under title 42 USC section 1983, as a sub-
sequent to any other proceedings this plaintiff initially submitted
A proper and concise Demand for A jury trial pursuant to FR
Civ.P Rule # 38(b) from which this court has never responded
to, Therefore triggering an ultimate motion titled FRCP Rule # 50
"Inter Alia"

This plaintiff is currently now Requesting that this court
grant an order for an entry of final judgment in Accordances
with FRCP Rule # 73 in that this said plaintiff submits to the
clerk of this court in the interest & justice

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Case 2:20-cv-2261 plaintiff's Motion pursuant
to LR # 301/LR # 291/ FRCvp # 73/ & FRCvp # 50/

"Continued"

the plaintiff already above identify also and hereby Request
The Rule of Liberal Construction, notwithstanding all provisions
and Rules of this Court Regarding an Entry of Default
Judgment pursuant to F.R.Cvp Rule # 55(b)(2).

this plaintiff hereby moves this Court to Enter A Judgment
in favor of said plaintiff AS this Request is appropriate
Especially for the stated Reasons and Because this Matter
is ongoing and has been since November-12-2020 upon
all other factors this Court has failed to Respond to this
plaintiff's Motions, In support of this Motion we Ask
this Court to take Judicial Notice of the following Court
Rulings See Draper vs. Coombs 792, F.2d, 915 (9th Cir 1986),
and Eitel vs. McCol 782, F.2d 1472, 4 FR. Serv 60 (9th Cir 1986)

Conclusion and prayer of Relief

As this is not an Issue-Matter of Conjecture this plaintiff
has suffered injuries from the incident of January 10th 2020
and is still suffering from such and will continue to suffer long
Term Medical Damages for need of constructive surgery and Therapy
We hereby Request that this Court consider the original Request
for money Damages and its specific sum, Alternatively
A Motion pursuant to FRCvp Rule # 55, for notice is hereby
given, for default with a Request for sanctions
However please currently consider any material issues & facts for
substantial reasons for this Court's failure to Respond and if such
failures has any particular way may have prejudiced this case
Respectfully submitted by

Christopher N. Washington

Dated 12/24/2024

Proof of Service By Mail

I plaintiff Christopher Nathaniel Washington
in the matter at titled case name and number

washington vs Diaz case # 2:20-cv-2261 currently
now pending in this court

I am over the age of 18 yrs and my current
Address is as follows

Christopher Washington # 477851
HOSP. BOX # 3030
Sacramento CA 95814

and that on

12-24-2024 I submitted the
following documents to this court by placing
said documents inside a envelope pre-addressed and
pre-stamped to the following interested persons

United States District Court	Office to the DOJ
Eastern District of California	Attorney General
501 "I" Street Suite # 4-200	455 Golden Gate Ave
Sacramento CA 95814-2322	# 11000

	San Francisco CA
	96127-5030

Respectfully Submitted by

Christopher Washington

Date 12/24/2024